

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**SWISSDIGITAL USA CO., LTD.**

**Plaintiff,**

**v.**

**WENGER S.A.**

**Defendant.**

§  
§  
§  
§  
§  
§  
§

**Civil Action No. 6:21-cv-453-ADA**

**JURY TRIAL DEMANDED**

**NOTICE OF AGREED REQUEST FOR EXTENSION OF TIME**

Plaintiff Swissdigital USA Co., Ltd. (“Plaintiff” or “Swissdigital”) and Defendant Wenger S.A. (“Defendant” or “Wenger”) respectfully request reciprocal one-week extensions of time for the parties to file their respective Responsive and Reply Claim Construction Briefs. Pursuant to the Court’s Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines, the Parties hereby submit this Notice to the Court extending the deadlines as follows:

- Plaintiff’s deadline to file its Responsive claim construction brief is extended up to and including April 14, 2022;
- Defendant’s deadline to file its Reply claim construction brief is extended up to and including April 28, 2022.

Dated: March 24, 2022

Respectfully submitted,

/s/ Dariush Keyhani  
Dariush Keyhani (*pro hac vice*)  
Frances H. Stephenson (*pro hac vice*)  
Keyhani LLC  
1050 30th Street NW  
Washington, DC 20007  
T. 202.748.8950  
F. 202.318.8958  
dkeyhani@keyhanillc.com  
fstephenson@keyhanillc.com

Jacqueline P. Altman  
State Bar No. 24087010  
John P. Palmer  
State Bar No. 15430600  
John A. “Andy” Powell  
State Bar No. 24029775  
USPTO Reg. No. 71,533  
NAMAN HOWELL SMITH & LEE, PLLC  
400 Austin Ave., Suite 800  
Waco, Texas 76701  
jaltman@namanhowell.com  
palmer@namanhowell.com  
apowell@namanhowell.com

*Attorneys for Plaintiff Swissdigital USA Co., Ltd.*

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on March 23, 2022, counsel for Plaintiff spoke with counsel of record for Defendant, who indicated that Defendant agrees to the relief requested herein.

/s/ Dariush Keyhani  
Dariush Keyhani

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of March, 2022, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys or record who have who have consented to accept this Notice as service of this document by electronic means.

/s/ Dariush Keyhani  
Dariush Keyhani